

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Evelyn Kepple fka Evelyn Picinich	:	CHAPTER 13
	:	
Debtors.	:	18-bk-02826-RNO
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Toyota Motor Credit Corporation	:	
	:	
Movant,	:	
	:	
v.	:	11 U.S.C. §362
	:	
Evelyn Kepple, Daniel Sherer and	:	
Charles J. DeHart, III	:	
	:	
Respondents	:	

ANSWER TO MOVANT’S MOTION FOR RELIEF

AND NOW, comes the Debtor, Evelyn Kepple, by and through her Attorney, Patrick J. Best, of ARM Lawyers, who hereby answers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. The loan payments are current.
7. Denied. The loan payments are current.
8. Denied. The loan payments are current.
9. Denied. As there is no basis for relief, there is no basis to waive Rul3 4001(a)(3).

WHEREFORE, Debtors respectfully request that this Honorable Court deny Movant’s Motion for Relief.

Date: December 26, 2019

/s/ Patrick J. Best

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